Supreme Court, U.S.
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No. 87-49

IN THE

Supreme Court of the United States

OCTOBER TERM, 1987

ALASKA AIRLINES, INC., *et al.*,
Petitioners,

v.

WILLIAM E. BROCK, SECRETARY OF LABOR, *et al.*,
Respondents.

On Petition For A Writ of Certiorari to the United States Court of Appeals For the District of Columbia Circuit

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RESPONSE OF RESPONDENT AIR LINE PILOTS ASSOCIATION IN OPPOSITION

EUGENE B. GRANOF*
AIR LINE PILOTS ASSOCIATION
1625 Massachusetts Ave., N.W.
Washington, D.C. 20036
(202) 797-4119
**Counsel of Record*

PRESS OF BYRON S. ADAMS, WASHINGTON, D.C. (202) 347-8203

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For the reasons stated in the brief for the Secretary of Labor in opposition to the petition for certiorari, the Air Line Pilots Association ("ALPA") submits that the decision of the court of appeals was correct, that the issues raised by the petition do not warrant consideration by this Court in any event, and that, accordingly, the petition should be denied. We present this statement in opposition in order to set forth ALPA's position on the petition without burdening the Court with what would be essentially a repetition of the arguments advanced by the Solicitor General.[1]

[1]ALPA is a labor organization which is the bargaining agent for approximately 40,000 commercial airline pilots employed by 46 U.S. carriers. Because of the obvious interest of its members in the "first right of hire" employee protection provision which

Respectfully submitted,

EUGENE B. GRANOF*
AIR LINE PILOTS ASSOCIATION
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036
(202) 797-4119
Counsel for Air Line Pilots Association
**Counsel of Record*

September 4, 1987

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was enacted for their benefit -- Section 43(d) of the Airline Deregulation Act of 1978, Pub. L. No. 95-504, 92 Stat. 1705, *et seq.*, codified as 49 U.S.C. App. § 1552(d) -- ALPA intervened as a defendant in the district court, was an appellee/cross-appellant in the court of appeals, and was one of the respondents in this Court when the case was before it last term on the legislative veto issue. *Alaska Airlines, Inc. v. Brock,* 107 S. Ct. 1476 (1987).